

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS  
DOCKET NO.: 04CV-10357RCL

SHELDON G. ADELSON,  
Plaintiff,

v.

MOSHE HANANEL,  
Defendant.

**PLAINTIFF, SHELDON G. ADELSON'S, OPPOSITION TO THE MOTION OF THE  
DEFENDANT FOR LEAVE TO FILE AN ADDITIONAL EXHIBIT**

The Plaintiff, Sheldon G. Adelson ("Adelson"), opposes the motion of the Defendant to file an additional exhibit on the following grounds:

1. The Defendant has not complied with L.R. 7.1.
2. The exhibit that the Defendant wishes to file is an incomplete version of the entire decision of the court which concluded that the trial judge should again consider the issue of admissibility of documents exchanged by the parties in the course of pre-litigation negotiations. A copy of the entire decision and rulings is attached as Exhibit A.
3. Mr. Adelson's attorney, on March 20, 2006 has served his appeal, challenging the decision of the majority of the National Labor Court on Mr. Hananel's attorneys in Israel. There is no basis to assume that the resolution of this appeal will occur in any reasonably short time.
4. An examination of Adelson's brief filed in this court shows that the purpose of pointing out to this court the long delay (in excess of two and a half years) between the time the issue of the inadmissibility of settlement negotiation documents was first raised in a motion filed in March of 2002 and the lack of a decision was to show the glacial pace of litigation in the

Israeli courts. That a decision has been made does not change the argument or the fact of the leisurely progress of litigation in Israel.

Respectfully submitted,  
The Plaintiff,  
SHELDON G. ADELSON,  
By his attorneys,

/s/ Albert P. Zabin  
Franklin H. Levy, B.B.O. No.: 297720  
Albert P. Zabin, B.B.O. No.: 538380  
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Dated: March 20, 2006

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on March 20, 2006.

/s/ Albert P. Zabin  
Albert P. Zabin